

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:16CR00035 HEA
)	
JESSE MICHAEL KELLEY,)	
)	
Defendant.)	

GOVERNMENT'S MOTION TO CONTINUE
DEFENDANT'S SENTENCING HEARING

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Dean R. Hoag, Assistant United States Attorney for said District, and hereby moves the Court for a sixty-day continuance of defendant Kelley's sentencing hearing in the above-referenced matter, and in support thereof states as follows:

1. Currently, the sentencing hearing for defendant Kelley is scheduled for August 30, 2016.
2. The undersigned will be traveling back from a prosecution-related matter in Atlanta, Georgia, on said date.
3. Upon the undersigned's conversation with defense counsel Robert Wolfrum, the parties agree that it is in the best interest of defendant Kelley to continue his sentencing for sixty days. Mr. Wolfrum has no objections to the Government filing this request for continuance.

WHEREFORE, the Government respectfully requests this Court to continue the sentencing in this matter for sixty days, to a date and time convenient to the Court and parties.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Dean R. Hoag
DEAN R. HOAG, #23843MO
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following::

Robert Wolfrum
Asst. Federal Public Defender
(Attorney for defendant Kelley).

s/ Dean R. Hoag
DEAN R. HOAG, #23843MO
Assistant United States Attorney